

1 PORT AUTHORITY OF ALLEGHENY
2 COUNTY RETIREMENT AND DISABILITY
3 ALLOWANCE PLAN FOR EMPLOYEES
4 REPRESENTED BY LOCAL 85 OF THE
5 AMALGAMATED TRANSIT UNION, OF
6 VERISIGN INC., Derivatively on Behalf of
7 Nominal Defendant VERISIGN, INC.,

8
9 Plaintiff,

10 v.

11 D. JAMES BIDZOS, WILLIAM L.
12 CHENEVICH, DAVID J. COWAN, DANA L.
13 EVAN, QUENTIN P. GALLIVAN, MICHELLE
14 GUTHRIE, DIANA S. KEITH, ROBERT J.
15 KORZENIEWSKI, SCOTT G. KRIENS, LEN J.
16 LAUER, ROGER H. MOORE, EDWARD A.
17 MUELLER, ANIL H.P. PEREIRA, GREGORY
18 L. REYES, WILLIAM A. ROPER, JR.,
19 ARNOLD SCHAEFFER, STRATTON D.
20 SCLAVOS, LOUIS A. SIMPSON, RICHARD
21 A. YANOWITCH,

22 Defendants,

23 and

24 VERISIGN INC.,

25 Nominal Defendant.
26
27
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CASE NO. 5:06-cv-04902-RMW

WHEREAS, there are two related shareholder derivative actions on behalf of nominal defendant Verisign, Inc. ("Verisign") pending before this Court:

Abbreviated Case Name	Case Number	Date Filed
<i>Parnes v. Bidzos, et al.</i>	C-06-4165-PJH	07/05/06
<i>Port Authority v. Bidzos, et al.</i>	C-06-4902-RMW	09/--/06

WHEREAS, the two related Verisign shareholder derivative actions arise out of the same transactions and occurrences and involve the same or substantially similar issues of law and fact, and, therefore, should be consolidated for all purposes under Federal Rule of Civil Procedure 42(a);

WHEREAS, plaintiffs, after meeting and conferring, agree that Wolf Haldenstein Adler Freeman & Herz, LLP and Barrack, Rodos & Bacine should be appointed as Lead Counsel;¹ and

WHEREAS, plaintiffs and defendants, after meeting and conferring, agree that judicial economy will be served by setting a schedule for defendants' response to the Consolidated Complaint.

THEREFORE, IT IS STIPULATED AND AGREED by plaintiffs and defendants, through their respective counsel of record, as follows:

CONSOLIDATION OF ACTIONS

The following actions are hereby consolidated for all purposes, including pretrial proceedings, trial and appeal:

Abbreviated Case Name	Case Number	Date Filed
<i>Parnes v. Bidzos, et al.</i>	C-06-4165-PJH	07/05/06
<i>Port Authority v. Bidzos, et al.</i>	C-06-4902-RMW	09/--/06

1. The caption of these consolidated actions shall be "*In re Verisign, Inc. Derivative Litigation*" and the files of these consolidated actions shall be maintained in one file under Master

¹ Defendants take no position as to the appointment of Wolf Haldenstein Adler Freeman & Herz, LLP and Barrack, Rodos & Bacine as Lead Counsel.
STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO. C 06 4165 PJH

File No. C-06-4165-PJH. Any other actions now pending or later filed in this Court which arise out of or are related to the same facts as alleged in the above-identified cases shall be consolidated for all purposes, if and when they are brought to the Court's attention.

2. Every pleading filed in the consolidated actions, or in any separate action included herein, shall bear the following caption:

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re VERISIGN, INC. DERIVATIVE LITIGATION)	Master File No. C-06-4165-PJH
)	
)	

This Document Relates To:)	
)	
)	

3. When a pleading is intended to be applicable to all actions governed by this Order, the words "All Actions" shall appear immediately after the words "This Document Relates To:" in the caption set out above. When a pleading is intended to be applicable to only some, but not all, of the consolidated actions, this Court's docket number for each individual action to which the pleading is intended to be applicable and the abbreviated case name of said action shall appear immediately after the words "This Document Relates To:" in the caption described above (*e.g.*, "No. C-06-4165-PJH, *Parnes v. Bidzos, et al.*").

4. A Master Docket and a Master File hereby are established for the above consolidated proceedings and for all other related cases filed in or transferred to this Court. Separate dockets shall continue to be maintained for each of the individual actions hereby consolidated, and entries shall be made in the docket of each individual case in accordance with the regular procedures of the clerk of this Court, except as modified by this Order.

5. When a pleading is filed and the caption shows that it is applicable to "All Actions," the clerk shall file such pleading in the Master File and note such filing on the Master Docket. No further copies need be filed, and no other docket entries need be made.

STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO. C 06 4165 PJH

6. When a pleading is filed and the caption shows that it is to be applicable to fewer than all of the consolidated actions, the clerk will file such pleading in the Master File only but shall docket such filing on the Master Docket and the docket of each applicable action.

7. When a case which properly belongs as part of *In re Verisign, Inc. Derivative Litigation* is filed in this Court or transferred to this Court from another court and assigned to this Court, the clerk of this Court shall:

- (a) Place a copy of this Order in the separate file for such action;
- (b) Mail to the attorneys for the plaintiff(s) in the newly-filed or transferred case a copy of this Order and direct that this Order be served upon or mailed to any new defendant(s) or their counsel in the newly-filed or transferred case; and
- (c) Make an appropriate entry on the Master Docket. This Court requests the assistance of counsel in calling to the attention of the clerk of this Court the filing or transfer of any case which properly might be consolidated as part of *In re Verisign, Inc. Derivative Litigation*.

APPOINTMENT OF LEAD COUNSEL

8. The law firms of Wolf Haldenstein Adler Freeman & Herz, LLP and Barrack, Rodos & Bacine shall be appointed Lead Counsel for plaintiffs in the consolidated *In re Verisign, Inc. Derivative Litigation*.²

9. Lead Counsel shall have authority to speak for plaintiffs in matters regarding pretrial and trial procedure and settlement negotiations, and shall make all work assignments in such manner as to facilitate the orderly and efficient prosecution of this litigation and to avoid duplicative or unproductive effort.

10. Lead Counsel shall be responsible for coordination of all activities and appearances on behalf of plaintiffs and for the dissemination of notices and orders of this Court. No motion, request for discovery or other pretrial proceedings shall be initiated or filed by plaintiffs except through Lead Counsel.

² Defendants take no position as to the appointment of Wolf Haldenstein Adler Freeman & Herz, LLP and Barrack, Rodos & Bacine as Lead Counsel.
 STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO. C 06 4165 PJH

1 11. Lead Counsel also shall be available and responsible for communications to and
2 from this Court. Lead Counsel shall be responsible for the creation and maintenance of a master
3 service list of all parties and their respective counsel.

4 12. Defendants' counsel may rely upon all agreements made with Lead Counsel, or
5 other duly authorized representatives of plaintiffs, and such agreements shall be binding on
6 plaintiffs.

7 **SCHEDULE RE: FILING CONSOLIDATED COMPLAINT**

8 13. Plaintiffs shall no later than 45 days from the entry of this Order file and serve a
9 Consolidated Complaint, which will supersede all existing complaints filed in these actions.
10 Defendants need not respond to any of the pre-existing complaints. Service, pursuant to Rule 4 of
11 the Federal Rules of Civil Procedure, of any of the pre-existing complaints on any of the
12 defendants, or their counsel, shall constitute sufficient service on that defendant. Service shall be
13 effected with respect to any defendant named in any of the consolidated actions by serving the
14 Consolidated Complaint on that defendant or, with permission, that defendant's counsel.

15 14. Each defendant shall answer or otherwise respond to the Consolidated Complaint
16 no later than 45 days from the date of service. In the event that defendants file and serve any
17 motion directed at the Consolidated Complaint, plaintiffs shall file and serve their opposition
18 within 45 days after the service of defendants' motion. If defendants file and serve a reply to
19 plaintiffs' opposition, they will do so within 30 days after service of the opposition.

15. Defendants need not respond to the initial complaints filed in the above-referenced actions.

IT IS SO STIPULATED.

DATED: August 30, 2006

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DATED: August ____, 2006

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STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING
LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO.
C 06 4165 PJH

1 15. Defendants need not respond to the initial complaints filed in the above-referenced
2 actions.

3 IT IS SO STIPULATED.

4 DATED: August ____, 2006

WOLF HALDENSTEIN ADLER
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16 DATED: August 31, 2006

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28 Retirement and Disability Allowance Plan for Employees
Represented by Local 85 of the Amalgamated Transit Unit

STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING
LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO.
C 06 4165 PJH

1 DATED: August 31, 2006

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13 DATED: August 31, 2006

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28 STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING
LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO.
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Under F.R.C.P. 42(a), the four derivative action cases listed herein are hereby consolidated for all purposes. The law firms of Wolf Haldenstein Adler Freeman & Herz, LLP and Barrack, Rodos & Bacine shall be appointed Lead Counsel for plaintiffs. Plaintiffs shall serve a Consolidated Amended Complaint within 45 days of an order appointing Lead Counsel and Defendants shall file a responsive pleading within 45 days of service of the Consolidated Complaint.

IT IS SO ORDERED

Dated: 10/5/06 _____



VERISIGN:13741.STIP

STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO. C 06 4165 PJH

DECLARATION OF SERVICE

I, BORANY REINBOLD, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interested in the within action; that declarant's business address is 750 B Street, Suite 2770, San Diego, California. 92101.

2. That on August 31, 2006, declarant served the **STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT** via U.S. Mail in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

3. That there is regular communication between the parties.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st day of August 2006, at San Diego, California.


BORANY REINBOLD

VERISIGN, INC.
Service List -- August 31, 2006
Page 1

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